

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

CYNOSURE, LLC, et al.;

Plaintiffs,

v.

REVEAL LASERS LLC., et al.;

Defendants.

Civil Action No. 1:22-CV-11176-PBS

**JOINT REQUEST FOR DISMISSAL OF FAC DEFENDANTS**

As discussed at the September 26, 2025 Status Conference (the “Status Conference”), Plaintiffs and Defendants Tara Kosofsky, Matt Calabrese, Nate Dahlstrom, Matt Malone, Savannah Padron, Mark Sargent, and Jason Steinhorn (together “FAC Defendants”) <sup>1</sup> have reached a confidential settlement agreement to resolve Plaintiffs’ claims against the FAC Defendants. Plaintiffs and the FAC Defendants made an oral motion to dismiss the FAC Defendants at the Status Conference, and there was no opposition from any parties present at the Status Conference.

Accordingly, pursuant to Fed. R. Civ. P. 41, Plaintiffs and the FAC Defendants jointly request that the Court grant the parties’ oral motion and dismiss the FAC Defendants with prejudice in the above-captioned matter, with each party to bear their own costs and attorneys’ fees, and waiving all rights of appeal.

To avoid any doubt, this Joint Request and Order does not dismiss any claims against any defendant other than FAC Defendants or in any way affect any verdict or judgment in this case.

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<sup>1</sup> These individuals were made part of this case via Plaintiffs’ First Amended Complaint (Dkt. No. 63) (hereinafter, “FAC”), and, accordingly are referred to as the “FAC Defendants” for that reason and to distinguish them from Defendants Reveal Lasers LLC, Reveal Lasers Ltd., Robert Daley, Christopher Chambers, Cory Murrell, Brogan Bair-Chambers, Joshua Smith, Michael Russo, Kyle Shapero, Jason Kalso, David Krueger, Dean Fiacco, Robert Fiacco, Daniel DeMarco (collectively, the “Original Defendants”). It should be noted that there were originally sixteen FAC Defendants, but as a result of Plaintiffs’ Notice of Voluntary Dismissal of Certain Defendants Without Prejudice (Dkt. No. 270), filed on October 6, 2023, only the seven individual FAC Defendants named above remain in the case at this time.

IT IS SO REQUESTED AND STIPULATED, THROUGH COUNSEL OF RECORD FOR PLAINTIFFS AND THE FAC DEFENDANTS.

DATED: September 26, 2025

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**[PROPOSED] ORDER**

Upon motion of the parties, and good cause being found, FAC Defendants Tara Kosofsky, Matt Calabrese, Nate Dahlstrom, Matt Malone, Savannah Padron, Mark Sargent, and Jason Steinhorn are dismissed from this action with prejudice, with each party to bear their own costs and attorneys' fees, and waiving all rights of appeal

IT IS SO ORDERED.

DATED: \_\_\_\_\_  
Hon. Patti B. Saris  
United States District Judge

**CERTIFICATE OF SERVICE**

I, Dipanwita Deb Amar, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper and/or electronic copies will be sent to those indicated as non-registered participants on September 26, 2025.

/s/ Dipanwita Deb Amar

Dipanwita Deb Amar